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Remarks/Arguments

Claims 40-70 are pending In the application. For at least the reasons stated below,
Applicant asserts that all claims are now in condition for allowance.

**Please note: Portions of the Examiner's comments in the Office Action are
included as part of the following sections of this paper. The Examiner's quoted
sections are shown using the "Courier New" font to distinguish them from the
Applicant's current remarks, which are shown using the "Verdana" font.**

1.   35 U.S.C. § 103 Rejections: Claim 40

The Examiner said:

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Claims 40-50, 52, 53, 56-61, 63-65 and 68-70 are rejected under
35 USC 103(a) as being unpatentable over Chelliah et al. (patent
number 5,710,887, hereinafter referred to as "Chelliah"), in view
of Fleming (PTO-892, Item: U).

Chelliah teaches a method of conducting electronic commerce
between a plurality of customers and one or more service
providers via an electronic mall. The mall provides a central
user interface that connects the customer to one or more service
providers that participate in the electronic mall. The electronic
mall monitors and logs customer transactions, creates customer
profiles based on demographics and purchasing habits, targets
services based on the customer's demographics and purchasing
habits, receives transaction information from the customer based
on customer selections of information.

Fleming teaches online service providers who are government
agencies, filing electronic documents over the Internet formatted
to meet the needs of the government agencies requiring the
filings, and further teaches routing filed forms to other
agencies based on the one-time filing.
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Applicant opposes these § 103(a) rejections. Referring to the independent claim 40, one
embodiment of the invention is claimed to be:

40.   A method for electronically communicating with a plurality of government
       agencies in a business-to-government system comprising:

(a)   registering a system user, wherein a system user profile Is created and a
       unique Identifier Is generated and associated with the system user;

(b)   receiving identification information from the system user such that the identification information is verified and associated with the unique identifier of the system user;

(c)   providing to the system user secured access to a plurality of services upon verification of the identification information, wherein access to the plurality of services is limited based on the system user profile;

(d)   managing transaction information from the system user, wherein the transaction information is processed to conform with standards from at least one of the plurality of government agencies, additional information is received from at least one of a previous government filing and the system user profile, and a report is prepared based on the transaction information and additional information received;

(e)   filing the report, wherein a receiving government agency is determined from among the plurality of government agencies, and the report is transmitted to the receiving government agency through a business-to-government interface, the business-to-government interface connecting the system user to the plurality of government agencies through a single communication portal;

(f)   tracking user transactions, wherein the user transactions include filing the report, and wherein a history of user transactions is stored such that the user can access the history; and

(g)   performing billing functions based on the user transactions.

As will now be shown, the cited references (neither alone nor in combination) teach or suggest each of these required elements of claim 40.

A.   Element (d) of claim 40 is not taught

In support of element 40(d), the Examiner asserts that Chelliah teaches:

> Managing transaction information from the user, conform to standards: compliance with CORBA; meeting the needs and responsibilities of the entities involved; validates user selection; validates payment to provider (see at least col. 2, lines 36-43; col. 9, lines 44-48; col. 13, lines 10-19; col. 14, lines 56-58; col. 16, lines 21-31).

Broadly speaking, to teach all of restrictions found in element 40(d), the Examiner's reference must teach: (1) managing user's transaction information; (2) the transaction data conforming to a standard; (3) the standard being from one of the government agencies; (4) receiving additional data from a previous governmental filing; and (5) creating

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a report based on both the transaction information and the additional data from the previous government filing. Chelliah fails to teach or suggest several of these restrictions found in element 40(d).

The cited sections of Chelliah discuss several different concepts, namely:

(i)   Transactions between a supplier and at least one customer [col. 2, lines 36-43];

(ii)   The CORBA standard allows program objects to transparently make requests and receive responses [col. 9, lines 44-48];

(iii)   A transaction is made up of: starting a shopping session; selecting items to buy; and completing the shopping session [col. 13, lines 10-19];

(iv)   One program object validates a selected item against the product database and adds the item to the purchase list [col. 14, lines 56-58]; and

(v)   Input validation includes validating the customer's payment method and password (PIN) using a payment handler interface [col. 16, lines 21-31].

Comparing the restrictions in element 40(d) to these Chelliah teaches, one can see Chelliah has at least two shortcomings, namely:

Restriction from element 40(d)	Closest information from Chelliah	Explanation of Chelliah's failure to teach the element's restriction
(1) managing user's transaction information	Transactions between a supplier and at least one customer [col. 2, lines 36-43]	Claim 40 requires business-to-government interaction, not supplier-to-customer
(2) the transaction data conforming to a standard	The CORBA standard allows program objects to transparently make requests and receive responses [col. 9, lines 44-48]	CORBA is an architecture to allow program objects to communicate to one another regardless of the language they are programmed in or the operating system they are operating on. CORBA is not a standard that is used to format data.
(3) the standard being from one of the government agencies	The CORBA standard allows program objects to transparently make requests and receive responses [col. 9, lines	CORBA is not a standard that is "from one of the government agencies" concerning the data field formats for their electronic filings. Rather, CORBA is a communication architecture

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	44-48];	
(4) receiving additional data from a previous governmental filing	none	**There is no teaching of receiving information from a previous governmental filing**
(5) creating a report based on both the transaction information and the additional data from the previous government filing	none	**There is no teaching of creating a report, let alone a report that contains info both from the transaction information as well as the data from a previous governmental filing**

As the above table shows, Chelliah fails to teach several of the restrictions in element (d) of claim 40.

B.   Element (e) of claim 40 is not taught

In support of element 40(e), the Examiner concedes that Chelliah does not disclose filing a report with a government entity.   Instead, the Examiner relies on Fleming. According to the Examiner:

> Fleming teaches replacing manual activity by conducting business with government departments over the Internet. Fleming teaches citizen-to-government online interaction and business-to-government online interaction, the adoption of electronic forms used to transfer the collection and processing of information from a physical world to and electronic world, providing automatic validation of data using encrypted electronic signature, converting a paper form into an electronic form, filing taxes, and filing a notification of self-employment once electronically and automatically routing the form to three different government departments (U: see at least pages 1-2).
>
> Therefore it would have been obvious to one of ordinary skill in the art at time of the invention to modify Chelliah to include submitting an electronic form with any number of service providers as taught by Fleming, in order to conduct electronic form filing activities with a service provider providing government services.

A careful reading of Fleming shows its shortcomings. Fleming discusses how the "notification of self-employment" form will be converted to an online form. When a person

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completes such a form, it is transmitted "once, automatically going to each organization, instead of being copied twice and circulated by civil servants". In other words, according to Fleming the user submits the form electronically and it is automatically sent to all three agencies: (1) the Inland Revenue agency, (2) the Customs and Excise agency, and (3) the Contributions agency. The user is given no power to choose which agency the form is sent to. Each time the form is sent to all three groups. Thus, *Fleming fails to teach the required step of "a receiving government agency is determined from among the plurality of government agency".*

In addition, the Fleming system enables citizens who need to submit the form to transmit the form to all three of these agencies. There is no business-to-government transaction. Rather it is a citizen-to-government transaction. Thus, *Fleming fails to teach the required step of "through a business-to-government interface, the business-to-government interface connecting the system user to the plurality of government agencies through a single communication portal".*

C.   Element (f) of claim 40 is not taught

In support of element 40(f), the Examiner asserts that Chelliah teaches:

> Tracking user interactions: tracks user interactions for historical or realtime analysis (see at least col. 7, lines 40-45; col. 25, lines 65-67).

Element 40(f) requires that the history of user transactions be "stored such that the user can access the history". **Chelliah does not provide any user-available history of prior user transactions.** Column 25 in Chelliah discusses the "observation subsystem" that the Examiner asserts teaches tracking user interactions. It is true that the observation subsystem is used to "record observable data that results from customer interactions". However, such observations are not available to the user. Rather, as even the Examiner asserts, the history is kept "for historical or realtime analysis". This information is "displayed to a store operator ... for monitoring sales volume" (col. 25, lines 28-45). The historical analysis is not for the user. Rather, it can "be processed to determine if there is a trend signifying an increase over time of purchase of selected items" and the historical

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information can be used "to direct particular promotions to customers having similar attributes" (col 25, lines 28-45). As a reading of column 25 shows, **Chelliah fails to teach** **"wherein a history of user transactions is stored _such that the user can access the history_."**

D.   Claim 40 Conclusion

The Chelliah and Fleming references (alone or in combination) fail to teach several requirements of independent claim 40, including at least the requirements of:

(i)   "additional information is received from at least one of a _previous government filing_ and the system user profile, and a _report is prepared based on the transaction information and the additional information [of the previous government filing] received_"; (per element 40(d))

(ii)   "a receiving government agency is _determined from among_ the plurality of government agency"; (per element 40(e))

(iii)   "through a _business-to-government interface_, the business-to-government interface connecting the system user to the plurality of government agencies through a single communication portal"; (per element 40(e)) and

(iv)   "a _history of user transactions_ is stored such that the _user_ can access the history" (per element 40(f)).

Because Chelliah and Fleming fail to teach or suggest all of claim 40, Applicant requests that the 35 USC 103 rejection be withdrawn from independent claim 40.

2.   35 U.S.C. § 103 Rejections: Claim 70

Claim 70 was previously added to contain all of the restrictions of claim 40 as well as the subject matter of claims 44, 45, 46 and 48. As just discussed, the cited references fail to teach at least four of the elements of claim 40 that are also found in claim 70. In addition, the references (alone or in combination) fail to teach or suggest subject matter in claim 70 from claims 44-46 and 48, namely:

(i)   element 70(c) additionally requires the use of certificates for verifying the identification information;

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(ii)   element 70(d) additionally requires the use of encryption when the system
        user secures access; and

(iii)   element 70(i) additionally requires the use of a customizable user interface,
        which can be used to determine which of the government agencies with which
        the user wishes to communicate.

A.   Elements (c) and (d) of claim 70 are not taught.

The Examiner asserts that Chelliah teaches certificates because it:

> "computes an encrypted payment authorization token based upon the
> password entered by the user (see at least col. 16, lines 16-
> 20)".

This section of Chelliah at column 16 discusses how the user interface computes a "payment
authorization token" which is encrypted "based upon the password entered by the user."
While it is true that certificates (i.e., digital certificates) may involve encryption, encryption
is just a small portion of the certificate methodology. Digital certificates are issued by a
Certificate Authority and usually consist of a public encryption key and other data. The
holder of the digital certificate is also given a private key. This combination of public and
private keys can be used to exchanged encrypted messages or to verify the author/owner of
a message or transaction. Encryption has been in use since ancient times. But the
development of private/public key encryption used as a digital certificate is less than 10
years old. Thus, inclusion of the word "encrypted" in Chelliah does not offer enough
information to teach or to suggest the use of digital certificates.

B.   Element (i) of claim 70 is not taught.

The Examiner asserts that Chelliah teaches a customizable user interface that allows the
user to determine which government agency to communicate with because it:

> "displays information based on customer's demographics or
> purchasing habits (see at least col. 9, lines 64 through col. 10
> line 2; col. 12, lines 34-42)"

There is no teaching or suggestion here in Chelliah about providing a user interface that is
customizable. As discussed above, nor is there any teaching in Chelliah or Fleming about
using a user interface to choose which government agencies to communicate with. Rather,

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Fleming discusses an automatic association between the form and the three agencies where when the user transmits the form it is automatically duplicated and sent to all three agencies. The user cannot choose to only send it to the first, the second or the third agency.

Because the portions of claim 70 that match claim 40 have several restrictions not taught by the cited references and because also elements (c), (d) and (i) of claim 70 also are not taught by Chelliah, Applicant requests that the 35 USC 103 rejection be withdrawn.

3.   Dependent claims 44, 45, 46 and 48 are not taught

The Examiner also rejects the claims that are dependent on claim 40. At least claims 44, 45, 46 and 48 have additional elements not taught by Chelliah. The subject matter from these claims are also found in claim 70. As discussed above, Chelliah fails to teach this subject matter. Applicant requests that the rejections from claims 44, 45, 46 and 48 be withdrawn for these reasons. Furthermore, Applicant requests that the rejections for all other dependent claims be withdrawn as they are all based on claim 40, which is in form for allowance.

4.   Conclusion

Applicant submits that for at least the above-identified reasons, all pending claims are allowable over the art of record and respectfully requests that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (612) 607-7508. If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to

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charge such fees Including fees for any extension of time, to Deposit Account No. 50-1901
(Docket 60021-305107).

Respectfully submitted,

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